



Agency for Toxic Substances
and Disease Registry
Atlanta, GA 30333

December 21, 2011

RADM William S. Stokes
Executive Director
ICCVAM
National Institute of Environmental Health Sciences, (NIEHS)
P. O. Box 12233
Mail Code EC-17
Research Triangle Park, North Carolina 27709

Dear RADM Stokes:

I am writing in response to a letter from Dr. Linda Birnbaum, Director, National Institute of Environmental Health Sciences (NIEHS) requesting that the Agency for Toxic Substances and Disease Registry (ATSDR) review the following report from the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) and the National Toxicology Program Interagency Center for the Evaluation of Alternative Toxicological Methods (NICEATM).

ICCVAM Test Method Evaluation Report, "Usefulness and Limitations of the Murine Local Lymph Node Assay for Potency Categorization of Chemicals Causing Allergic Contact Dermatitis in Humans (NIH Publication No. 11-7709).

First and foremost, I would like to commend the work of the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) by reducing the number of animals used in testing through refinement of testing methods and replacement of animals with in vitro testing. This is a tremendous challenge society faces, as new chemicals are being introduced into commerce faster than toxicity testing can be performed, while at the same time facing more and more constraints on testing resources. Promoting advances in alternative methods and maintaining scientific quality without compromise of human, animal, and the environmental health should remain our goal.

Thank you for the opportunity to review and comment on these proposed test methods. The Centers for Disease Control and Prevention/ATSDR concurs with your recommendations regarding these methods and agrees that these test methods should be considered before using whole animals for toxicity testing. The ICCVAM recommended methods should be used as appropriate.

ATSDR uses experimental toxicity testing data but does not perform testing ourselves. Findings from contact allergic dermatitis testing can play an important role in the Agency's health assessment activities and thus we encourage ICCVAM's pursuit of developing and

harmonizing these methods. We look forward to being able to use these methods in our health activities. At this time, we do not have any other alternative test methods to recommend for the categorization of chemicals causing contact dermatitis in humans.

If you need any further information, please contact Dr. Moiz Mumtaz, Science Advisor, Division of Toxicology and Environmental Medicine (DTEM), our principal agency representative to ICCVAM at (770) 488-3349, or Dr. John Wheeler, Acting Associate Director of Science, DTEM, ATSDR at (770) 488-0775.

Sincerely,

/s/

Christopher J. Portier, Ph.D.
Director, National Center for
Environmental Health, and
Agency for Toxic Substances and
Disease Registry